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March 1, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Steven Nerayoff & Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendants Steven Nerayoff and Michael Hlday (“Defendants”) submit this joint letter to respectfully request and adjournment of the conference currently scheduled for March 2, 2021 to a date during the week of April 12, 2021 or to any other date convenient to the Court. The parties are currently engaged in plea negotiations and believe that one more adjournment will provide enough time to reach a resolution or make a final determination as to whether to proceed to trial. Defendants consent to the exclusion of the time from March 2, 2021, to the date set for the next conference from Speedy Trial Act calculation. The government consents to the Defendants’ application.

Thank you for your Honor’s consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Andrey Spektor (by ECF)
AUSA Mark Bini (by ECF)
Arthur Aidala, Esq. (by ECF)